



State of Vermont

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Department of Forests, Parks and Recreation
Department of Environmental Conservation
State Geologist
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AGENCY OF NATURAL RESOURCES
Department of Environmental Conservation

Waste Management Division
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October 3, 2000

Mr. Howard Clay
Luzenac America, Inc.
P.O. Box 680
Windsor, VT 05089

RE: Site Management Activity Completed (SMAC) designation for the Luzenac America, Columbia Mill in Ludlow (Site #99-2619)

Dear Mr. Clay:

The Sites Management Section (SMS) has reviewed the *Initial Site Investigation* report by DSM Environmental Services, Inc. for the above referenced site. Based on the information presented, the SMS has determined the site to be eligible for a Site Management Activity Completed (SMAC) designation.

This determination was based on the following:

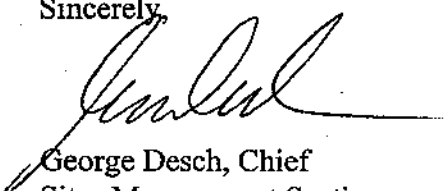
- The likely source of contamination at the site was the former cast-in-place reinforced concrete storage tank which was used for storage of #2 fuel oil. This tank was reportedly pumped out and destroyed in the early 1980s.
- Groundwater in the vicinity of the former tank does not contain petroleum contaminants in excess of Vermont Groundwater Enforcement Standards (VTGWES) as indicated in laboratory results from onsite monitoring wells.
- The two downgradient seeps were sampled and found to be free of petroleum contaminants.
- Little to no risk is posed to any sensitive receptors in the area from any residual contamination which may remain in the subsurface at the site.

Based on the results of the investigation, the site has been assigned a Site Management Activity Completed (SMAC) designation. Sites which the Waste Management Division have determined require no further management are given a SMAC designation. The designation does not release Luzenac America from any past or future liability which may arise from the petroleum contamination which originated from the former UST at the Luzenac America, Columbia Mill in Ludlow, Vermont. The SMAC designation does mean that the SMS isn't requiring any additional work be performed at this site in response to the initial contamination.

If the monitoring wells at the site are no longer used or maintained, then they must be properly closed to eliminate a possible conduit for contaminant migration into the subsurface. This closure typically involves filling the wells with a grout material to prevent fluid migration in the borehole. Specific requirements for well closure are outlined in Section 12.3.5 in Appendix A of the Vermont Water Supply Rule - Chapter 21. Also, the road box or stand up well guard for a monitoring well must be removed before well closure is considered complete. The SMS considers reasonable costs to properly close monitoring wells at this site reimbursable by the Petroleum Cleanup Fund if uninsured and eligible costs for cleanup at the site exceed the \$10,000 deductible.

Please feel free to call either me or Chuck Schwer if you have any questions regarding the above.

Sincerely,


George Desch, Chief
Sites Management Section

c: Ted Reeves, DSM Environmental
DEC Regional Office
Ludlow Selectboard

lp/sites/992619/smacltr.wpd